UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT

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S.D. OF N.Y.W.P.

Paul M. Curtis, Plaintiff, Case No. 7:25-cv-03415-KMK

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Mekai Curtis, Rumble YM Inc., Aha You Thought Inc., and 360 Business Management Inc., Defendants.

MOTION FOR VOLUNTARY DISMISSAL UNDER RULE 41(a)(2)

To the Honorable Judge Kenneth M. Karas:

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff Paul M. Curtis respectfully requests that this Court grant leave to voluntarily dismiss the claims against Defendants Mekai Curtis, Rumble YM Inc., and Aha You Thought Inc., with prejudice.

This motion is made in good faith. Plaintiff seeks to narrow the scope of the litigation and focus solely on the parties directly responsible for the actions at issue. This dismissal is not the result of any settlement or admission of fault, but a strategic refinement to promote judicial economy and clarity.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and issue an Order dismissing Defendants Mekai Curtis, Rumble YM Inc., and Aha You Thought Inc. from this action with prejudice.

Respectfully submitted,

Paul M. Curtis

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Pro Se Plaintiff